



## CITY OF PUYALLUP

---

### City Council

Puyallup City Hall  
333 South Meridian  
Puyallup, WA 98371  
253-841-5584

January 17, 2013

Alice Kelly  
Department of Ecology

Randel Perry  
U.S. Army Corps of Engineers  
Regulatory Branch

Tyler Schroeder  
Planning and Development  
Whatcom County

GPT/BNSF Custer Spur EIS  
Co-Lead Agencies  
c/o CH2M HILL  
1100 112th Avenue NE, Suite 400  
Bellevue, WA 98004

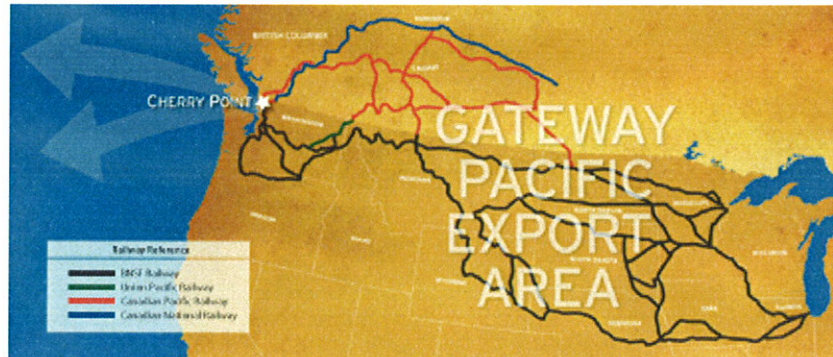
RE: Gateway Pacific Terminal at Cherry Point and Custer Spur Proposal  
City of Puyallup Scoping Comments

Ms. Kelly, Mr. Perry & Mr. Schroeder:

The City of Puyallup (City), under the authority of the Puyallup City Council, submits the scoping comments contained herein with respect to the forthcoming environmental impact statement for the Gateway Pacific Terminal at Cherry Point and Custer Spur proposal. The City understands that the Co-Lead Agencies are seeking input on the following four topics:

- Reasonable range of alternatives;
- Potentially affected resources and extent of analysis of those resources;
- Significant unavoidable adverse impacts; and
- Measures to avoid, minimize and mitigate effects of the proposals.

The City understands that the proposal proponent, Pacific International Terminals, plans to build a deep-water marine terminal at Cherry Point in Whatcom County. The proposed Gateway Pacific Terminal (GPT) will be used to import and export of up to 54 million dry metric tons of bulk commodities per year, with coal as the primary export. The export area for the GPT will encompass much of America's Northern Tier and Midwestern states. This export area is primarily served by the Burlington Northern Santa Fe Railway (BNSF). See the following depiction:



The transport activities associated with the GPT, especially rail transport of coal, will significantly impact the City of Puyallup. Although BNSF has rail routes through passes in the Cascade Mountains, the City understands that the coal trains will be routed along the southerly BNSF rail route in Washington, i.e., along the Columbia River and then north through various cities, including the City of Puyallup. The City understands that as many as 18 trains, each up to a mile and half long, will pass through Puyallup along the BNSF railroad to the GPT each day. (The City recommends that the Co-Lead Agencies consider the October 2012 Coal Train Impact Study prepared by Parametrix for the City of Seattle.)

The City of Puyallup is a historic town, and is a beautiful place to live, work, and play. Thus, the City is very concerned about the impacts that will occur as result of the frequent coal train traffic. The BNSF Railway runs directly through the City of Puyallup. Consequently, the coal trains will pass through Puyallup's historic downtown and residential neighborhoods, and by several schools. Also, the coal trains will travel through five at grade road crossing for arterials that are critical to the City's transportation network.

Without a full description of the activities that are, or will, be associated with transport activity to and from the proposed Gateway Pacific Terminal, including and especially rail activity, the City cannot identify all potentially affected resources and significant unavoidable adverse impacts. Nonetheless, the City anticipates that the following resources will be affected, or that the following impacts may, or will, occur:

1. Traffic delays and congestion occurring due to the passage of lengthy trains and more frequent rail traffic. Automobile and pedestrian traffic will be disrupted by rail traffic, i.e., as many as 18 trains a day that can take up to eight minutes to pass. Residents and businesses will experience delays at rail crossings, and the ability of police and fire to timely respond to emergencies will be intermittently interrupted;
2. Air quality degradation caused by locomotive exhaust, emission of dust or other particulate matter, and idling automobiles, which will also exacerbate the particulate matter non-attainment area in Pierce County;
3. Contamination of soil or property due to settling or deposits of coal dust or other particulate matter, emitted from transport trains, with associated health risks for people that live, work or play in Puyallup;



4. Noise pollution from train or other transport traffic;
5. Rail congestion arising from increased train traffic, with associated economic development impacts on the Port of Tacoma and surrounding industrial areas, and adverse impacts to the Sounder and Amtrak passenger rail services ;
6. Home value decreases in the vicinity of the BNSF line, which will pose an economic cost to the home owners as well as all of Puyallup's residents through increased property taxes to offset the decreased valuations; and
7. Hazardous material spills.

The City believes it is essential that that the Co-Lead Agencies study the specific impacts of the proposed activity on the City of Puyallup, including those possible impacts that are known to the Co-Lead Agencies, but are not identified herein. The City considers the impacts associated with the transport of coal on communities such as Puyallup to be direct effects of the GPT project.

The City also believes that the Co-Lead Agencies must require the proposal proponent to identify, and if the project is approved, implement measures to that will avoid, minimize or mitigate effects of the proposal, including, but not limited to:

1. Construction of an overpass over the BNSF railroad in northwest Puyallup for vehicular and pedestrian traffic;
2. Covered rail cars to prevent particulate matter emissions;
3. Planting or implementation of landscape or other buffers along the railroads to mitigate noise pollution;
4. Prioritization and scheduling of rail traffic to minimize congestion; and
5. Provision of equipment and training to local emergency response agencies.

The City recognizes the important economic benefits of the GPT proposal. However, the City believes it is critical that the Co-Lead Agencies examine the impacts and costs to the City of Puyallup and other communities that will be affected by the coal trains in order to determine the true impacts and benefits.

The City also joins other Pacific Northwest public officials and jurisdictions in their request to the Army Corps of Engineers for a separate comprehensive environmental review that addresses the cumulative impacts of all activities associated with proposed coal shipments to the five identified terminals in Oregon and Washington.

If you have questions concerning this matter, please contact Bill McDonald, City Manager.

Sincerely,



Richard D. Hansen  
Mayor

c: U.S. Senator Patty Murray  
U.S. Senator Maria Cantwell  
Governor Jay Inslee  
State Senator Bruce Dammeier  
State Representative Hans Zeiger  
State Representative Dawn Morrell  
Brigadier General John R. McMahon, Commander, NW Division, U.S. Army Corps of  
Engineers  
Ted Sturdevant, Director, Department of Ecology  
Jack Louws, Whatcom County Executive